

August 19, 2002

Docket Section
National Highway Traffic Safety Administration
400 Seventh Street, SW.
Washington, DC 20590

Dear Sir:

Ref: Docket No. NHTSA-2002-12231
RIN 2127-AI46

The International Association of Auto Theft Investigators (IAATI) is a world wide entity of law enforcement personnel and vehicle related business representatives in 42 countries. Our members are skilled and trained in vehicle theft investigations, vehicle identification and crime prevention.

Over the past 20 years, IAATI members have actively supported legislation which created the Motor Vehicle Theft Law Enforcement Act of 1984 and the Anti-Car Theft Act of 1992. The IAATI membership has adopted numerous resolutions calling for the expansion of component parts marking for all vehicles.

More than one million vehicles are stolen annually in the United States, costing victims more than seven billion dollars. Since the implementation of the noted laws requiring component parts marking on high theft vehicle lines, theft rates are lower for vehicles that are marked with component parts marking than vehicles whose parts are not marked.

On August 8, 2002, the IAATI membership in attendance at the 50th annual Seminar and Conference held in Albuquerque, New Mexico, adopted Resolution 02-07 calling for the following changes to be included in the Motor Vehicle Theft Prevention Standard as outlined in the Notice of Purposed Rulemaking as published in the Federal Register (Volume 67, Number 123, pages 43075-43087, June 26, 2002).

1. Effective date should be changed from September 1, 2005 to model year 2006.

Since manufacturers start production of vehicles prior to September 1 of each year, it is important that all vehicles produced for the model year 2006 be marked with component parts marking.

2. Expansion of parts marking to all vehicles 10,000 pounds GVWR or less, including light duty trucks, multipurpose passenger vehicles and vans.

Vehicle theft is not limited to passenger vehicles only. MPV, trucks and vans are routinely stolen for their parts or re-titled with new vehicle identification numbers and sold to innocent victims. By limiting the GVWR to 6,000 pounds or less, the most expensive MPV, trucks and vans that are targeted by thieves will be exempted from component parts marking.

3. Expand parts marking to all air bags and window glazing installed in vehicles.

The National Insurance Crime Bureau estimates that over 50,000 airbags are stolen annually, resulting in the loss of more than 50 million dollars to vehicle owners. Expanding parts marking to airbags and window glazing would assist law enforcement in the recovery and prosecution of persons who steal airbags. Currently, law enforcement is hampered in tracing airbags to determine if they are stolen or in what vehicle they were originally installed.

4. Eliminate the anti-theft (black box) exemption previously granted to manufacturers.

With the expansion of component parts marking mandated to begin in 2005 for all vehicles. It is unacceptable to continue to allow for previously granted anti-theft (black box) exemptions. Over the past 15 years, approximately 100 exemptions have been granted by NHTSA to manufacturers. Additionally, 20-25% of all vehicle thefts are key-related thefts, including car-jackings, making anti-theft devices ineffective. Anti-theft devices and component parts marking compliment each other to prevent vehicle theft, recover stolen vehicles and prosecute those who steal vehicles.

5. Establish performance standards to verify that manufacturers are complying with the requirements of the Motor Vehicle Theft Law Enforcement Act of 1984.

Several manufacturers are utilizing substandard labels for component parts marking that do not comply with established regulations for the removal of labels intact, anti-counterfeiting and footprint detection. Sanctions must be taken against manufacturers who use inferior parts marking.

6. Prescribe a Voluntary Vehicle Identification Standard.

49 U.S.C. Section 33107 allows for a Voluntary Vehicle Identification Standard to be prescribed by the Secretary of Transportation. Thousands of vehicles are voluntarily marked with component parts marking by their owners or manufacturers yearly. Because the vehicle was not listed in appendix AA@ (Vehicles required to be marked with component parts marking), prosecution in Federal Court under 18 U.S.C Section 511 is not allowed.

7. Small business exemptions should not be allowed.

Under the Motor Vehicle Theft Law Enforcement Act of 1984, manufacturers were only required to spend \$15.00 per vehicle for component parts marking. With current inflation standards, the new cost limit is \$24.68. Small business manufacturers should be able to apply component parts marking to vehicles they manufacture for under the current price limit.

8. Require R-DOT markings on all replacement parts for vehicles covered by the act.

Replacement parts for vehicles covered by the act need to be marked with R-DOT markings to assist law enforcement personnel and consumers in the recognition of salvaged/repaired vehicles. The R-DOT markings will identify the manufacturer of the replacement part and alert the consumer to the fact that a major part on a vehicle has been replaced. Law enforcement personnel will be able to distinguish authorized replacement parts with R-DOT markings from stolen parts that have had the component parts marking identification number removed.

9. Request NHTSA to encourage manufacturers to develop a more permanent marking system for all component parts.

Currently, all manufacturers are utilizing a label on major parts to comply with the component parts marking standard. Labels are often removed, defaced or completely destroyed by fire, thus hindering the identification of the component part/vehicle. NHTSA needs to encourage manufacturers to develop methods for a more permanent marking system for all component parts.

Sincerely,

Kent W. Mawyer
President
International Association Auto Theft Investigators
P.O. Box 246
Clinton, New York 13323

**International Association
of
Auto Theft
Investigators**

Resolution 02-07

Whereas, the National Highway Traffic Safety Administration (NHTSA) is requesting comments on proposed rulemaking changes to the Motor Vehicle Theft Prevention Standard.

Whereas, the International Association of Auto Theft Investigators (IAATI) is a world-wide entity of law enforcement personnel and vehicle related business representatives in 42 countries with thousands of members working and living in the United States, and

Whereas, IAATI is an internationally recognized association whose members are skilled and trained in vehicle theft investigation, identification and crime prevention, and

Whereas, more than one million vehicles are stolen annually in the United States which are valued at more than seven billion dollars, and

Whereas, 20-25% of vehicle thefts are “key-related” thefts, including car-jackings, making vehicles with black box exemptions ineffective, and

Whereas, the National Insurance Crime Bureau estimates that over 50,000 airbags are stolen annually, resulting in the loss of more than 50 million dollars to vehicle owners, and

Whereas, theft rates were lower for vehicles with component parts marking than those vehicles whose parts were not marked, and

Whereas, anti-theft devices in conjunction with parts marking provides a more effective multi-layered protection for the consumer, and

Whereas, the July 21, 2000, report by former Attorney General Janet Reno shows that parts marking has proven to be cost effective, and

Now be it therefore resolved, that the International Association of Auto theft Investigators supports the proposed rulemaking to the Motor Vehicle Theft Prevention Standard with the following modifications:

1. Effective date should be changed from September 1, 2005 to model year 2006.
2. Expansion of parts marking to all vehicles 10,000 pounds GVWR or less, including light duty trucks, multipurpose passenger vehicles and vans.

3. Expand parts marking to include all air bags and window glazing installed on vehicles covered by this act.
4. Eliminate the anti-theft (black box) exemption previously granted to manufacturers.
5. Establish performance standards to verify that manufacturers are complying with the requirements of the Motor Vehicle Theft Law Enforcement Act of 1984.
6. Prescribe a Voluntary Vehicle Identification Standard.
7. Small business exemptions should not be allowed.
8. Require R-DOT markings on all replacement parts for vehicles covered by the act.
9. Request NHTSA to encourage manufacturers to develop a more permanent marking system for all component parts.

Be it further resolved, that a copy of this resolution be forwarded to the Docket Section of the National Highway Traffic Safety Administration with a letter of introduction.

Adopted by the membership of the International Association of Auto Theft Investigators at their 50th Annual Seminar and Conference held in Albuquerque, New Mexico on this 8th day of August 2002.